

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 07-296
	:	
v.	:	DATE FILED: _____
	:	
MICHAEL BROWN	:	VIOLATIONS:
	:	18 U.S.C. § 922(g)(1)
	:	(possession of a firearm by a convicted
	:	felon - 2 counts)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute marijuana - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute MDMA - 1 count)
	:	18 U.S.C. § 924(c)(1) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking crime - 1 count)
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 12, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

MICHAEL BROWN,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Glock .40 caliber handgun, Model #27, serial #EDZ-665, loaded with eight live rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

MICHAEL BROWN

knowingly and intentionally possessed with intent to distribute a mixture or substance containing
a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

MICHAEL BROWN

knowingly and intentionally possessed with intent to distribute approximately 119 pills, with a net weight of approximately 27.97 grams, of a mixture or substance containing a detectable amount of Methylenedioxymethamphetamine, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

MICHAEL BROWN

knowingly possessed a firearm, that is, the firearms listed below, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1):

1. Intrac Arms AK-47 assault rifle, serial number 3-0223497;
2. Bush Master Model XM15-E2S assault rifle, serial number L189491;
3. Armi Tanfoglio Model GT 26 PAT .25 cal. semi-automatic handgun, serial number S06371;
4. Berretta EL 950 BS .22 cal. semi-automatic handgun, serial number BR01821T, and eight live rounds;
5. Colt M1991A1 .45 cal. semi-automatic handgun, serial number CP01145, and 8 live rounds;
6. Bush Master Model XM15-E2S assault rifle, serial number L048181;
7. Ruger P345 .45 cal. semi-automatic handgun, serial number 664-03599, and 9 live rounds; and,

8. Berretta M9-92FS 9mm semi-automatic handgun, serial number 0100M9,
and 10 live rounds.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

MICHAEL BROWN,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, the firearms listed below:

1. Intrac Arms AK-47 assault rifle, serial number 3-0223497;
2. Bush Master Model XM15-E2S assault rifle, serial number L189491;
3. Armi Tanfoglio Model GT 26 PAT .25 cal. semi-automatic handgun, serial number S06371;
4. Berretta EL 950 BS .22 cal. semi-automatic handgun, serial number BR01821T, and eight live rounds;
5. Colt M1991A1 .45 cal. semi-automatic handgun, serial number CP01145, and 8 live rounds;
6. Bush Master Model XM15-E2S assault rifle, serial number L048181;
7. Ruger P345 .45 cal. semi-automatic handgun, serial number 664-03599, and 9 live rounds; and,

8. Berretta M9-92FS 9mm semi-automatic handgun, serial number 0100M9,
and 10 live rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this superseding indictment, defendant

MICHAEL BROWN

shall forfeit to the United States of America:

1. any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$3908.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this superseding indictment, defendant

MICHAEL BROWN

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of this offense, including, but not limited to:

1. Glock .40 caliber handgun, Model #27, serial #EDZ-665, and eight live rounds;
2. Intrac Arms AK-47 assault rifle, serial number 3-0223497;
3. Bush Master Model XM15-E2S assault rifle, serial number L189491;
4. Armi Tanfoglio Model GT 26 PAT .25 cal. semi-automatic handgun, serial number S06371;
5. Berretta EL 950 BS .22 cal. semi-automatic handgun, serial number BR01821T, and eight live rounds;
6. Colt M1991A1 .45 cal. semi-automatic handgun, serial number CP01145, and 8 live rounds;
7. Bush Master Model XM15-E2S assault rifle, serial number L048181;
8. Ruger P345 .45 cal. semi-automatic handgun, serial number 664-03599, and 9 live rounds; and,

9. Berretta M9-92FS 9mm semi-automatic handgun, serial number 0100M9,
and 10 live rounds.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY